## IN THE UNITED STATES COURT OF FEDERAL CLAIMS

VIRGINIA ELECTRIC AND POWER COMPANY d/b/a DOMINION VIRGINIA ENERGY,	)	
Plaintiff,	)	Case No. 17-464C
v.	) )	Senior Judge Bruggink
THE UNITED STATES OF AMERICA,	)	
Defendant.	)	

## JOINT MOTION FOR A PROTECTIVE ORDER

Pursuant to Rules 5.2(e) and 26(c) of the Rules of the United States Court of Federal Claims, plaintiff Virginia Electric and Power Company d/b/a Dominion Virginia Energy (plaintiff) and defendant, the United States, respectfully request that the Court enter the attached proposed protective order governing certain productions of commercially sensitive or otherwise protectable information in the case.

The United States wishes to produce to plaintiff in the case certain documents related to the procurement of the contract at issue in this case that contain commercially sensitive information. The parties jointly propose the attached proposed order, which is based upon the Court's standard protective order, to facilitate discovery and ensure that certain sensitive information is not unnecessarily disclosed to the public or other non-parties to this case.

For these reasons, the parties respectfully request that the Court grant this motion.

## Respectfully submitted,

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